

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-----------------------------------|---|-------------------------|
| MARTIN M. MATUS, O.D., |) | |
| on behalf of plaintiff and |) | |
| the class members defined herein, |) | |
| |) | 19 C 1797 |
| Plaintiff, |) | |
| |) | Judge Dow |
| v. |) | Magistrate Judge Valdez |
| |) | |
| NORTH AMERICAN BANCARD, LLC, |) | |
| and JOHN DOES 1-10, |) | |
| |) | |
| Defendants. |) | |

PLAINTIFF'S UNOPPOSED MOTION TO EXTEND TIME

Plaintiff Martin M. Matus, O.D. respectfully requests pursuant to Fed. R. Civ. P. 6(b) an extension of time to file the motion for preliminary approval of the parties' class action settlement. In support thereof, plaintiff states:

1. Plaintiff and Defendant North American Bancard, LLC filed a notice of settlement on February 5, 2021. (*Dkt. No. 54*)
2. On February 15, 2021, this Court entered an order directing the parties to notice up the motion for settlement approval on March 26, 2021. (*Dkt. No. 55*)
3. The Parties have made significant progress on the settlement documents. Several drafts of settlement documents have been exchanged and the Parties believe that they are close to finalizing the settlement documents.
4. Accordingly, Plaintiff requests an extension of time from March 26, 2021 through and including April 5, 2021 to file the motion for preliminary approval.

5. Plaintiff does not request this extension for purposes of delay but rather to provide the Parties additional time to finalize and execute the settlement documents. Good cause exists to extend time as the Parties continue to work in good faith on the settlement.

6. Plaintiff has contacted Defendant in advance of filing this motion and Defendant does not oppose the relief requested in this motion.

WHEREFORE, Plaintiff requests an extension of time from March 26, 2021 through and including April 5, 2021 to file the motion for preliminary approval.

Respectfully submitted,

s/ Heather Kolbus
Heather Kolbus

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Cathleen M. Combs
Heather Kolbus
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CERTIFICATE OF SERVICE

I, Heather Kolbus, certify that on March 24, 2021, I caused a true and accurate copy of the foregoing document to be filed via the court's CM/ECF system which caused notice via email to be sent to the following parties:

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